



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO ATTENTION OF
ECW-15J

VIA ELECTRONIC MAIL

Mayor Curtis McCall Sr.
City of Cahokia Heights
103 Main Street
Cahokia, Illinois 62206
rwilliams@centownil.com

Subject: August 16, 2021, Administrative Order on Consent ("Order") – Disapproval of Targeted Dry-Weather SSO Investigation Plan (paragraph 48.B.a)

Dear Mayor McCall:

Thank you for submitting the September 14, 2021, Targeted Dry-Weather SSO Investigation Plan ("plan"), pursuant to paragraph 48.B.a of the above-referenced Order. The U.S. Environmental Protection Agency reviewed the plan and after consulting with the Illinois EPA, determined that it fails to meet the Order's requirements, specifically each of the plan components outlined in paragraph 48.B.a.i-vi. Based on this review, EPA hereby disapproves the September 14, 2021 Targeted Dry-Weather SSO Investigation Plan. We will be prepared to discuss the deficiencies of the proposed plan in more detail at our meeting with your staff on September 29.

Pursuant to paragraph 48.B.b of the Order, please submit the revised plan within 30 days after your receipt of this letter. The revised plan must address each of the requirements included in paragraph 48.B.a.i-vi of the Order, and specifically target the three dry-weather SSO locations identified in paragraph 48.B. Also, the September 14, 2021, Targeted Dry-Weather SSO Investigation Plan did not include the certification statement required pursuant to paragraph 54 of the Order. Please include this certification in all future Order submittals.

Thank you for your efforts to bring the City into compliance with the Clean Water Act. If you have any questions or concerns regarding this disapproval, please contact Dean Maraldo of my staff at (312) 353-2098 or maraldo.dean@epa.gov, or your legal counsel may contact Lauren Grady at (202) 598-1866 or lauren.grady@usdoj.gov.

We look forward to receiving your response.

Sincerely,

Michael D. Harris
Director
Enforcement and Compliance Assurance Division

cc: Rory Morgan, City of Cahokia Heights [rmorgan@cahokiaillinois.org]
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